

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In Re:
WILLARD JONES JR
SARA L JONES

Chapter 13
Case No. 2017-21767-GMH-13

Debtors

**NOTICE OF TELEPHONIC HEARING &
OBJECTION TO CONFIRMATION OF
MODIFIED CHAPTER 13 PLAN**

Now comes the Chapter 13 Standing Trustee, Rebecca R. Garcia, and objects to confirmation of debtors' Chapter 13 Plan filed on January 5, 2018, for the reason that:

The plan has not been proposed in good faith 11 U.S.C. §1325(a)(3). The plan filed January 5, 2018 fails to re-state all the prior modifications of the plan as previously amended. The Trustee is unclear how to treat the secured claims filed by Security Auto Loans, Inc., The Payday Loan Store, the State of Wisconsin - DWD, and the Wisconsin Department of Revenue. In addition, the amended plan has two references to a priority claim, "Proof of claim No. 3," however, claim number 3 on the court claims register is a non-priority unsecured claim. The Trustee is not clear what the debtor is referencing in this section of the amended plan.

The proposed plan is not substantiated by a budget.

WHEREFORE, trustee prays for denial of confirmation of debtors' Chapter 13 Plan filed January 5, 2018.

NOTICE OF TELEPHONE HEARING

TO: WILLARD JONES JR
SARA L JONES

NICKOLAI AND POLETTI LLC
Trustee Rebecca R. Garcia

PLEASE TAKE NOTICE that a telephone hearing will be held via conference call before the Honorable G. Michael Halfenger, United States Bankruptcy Judge, United States Bankruptcy Judge, on **April 3, 2018 at 1:00 PM**, to consider the Trustee's Objection to Confirmation of the Modified Plan filed January 5, 2018.

To appear by telephone, you must call the court conference line at 1-888-684-8852, and enter access code 7183566 before the scheduled hearing time. Please note that the Court may already be in session, so please wait quietly on the telephone for your case to be called. The debtor is welcome, but not required to, participate in this hearing.

Dated the 13th day of March 2018.

/s/ Rebecca R. Garcia
Chapter 13 Trustee

Rebecca R. Garcia Chapter 13 Standing Trustee P O Box 3170 Oshkosh, WI 54903-3170 920.231.2150 Fax 920.231.5713 E-mail info@ch13oshkosh.com

In Re:
WILLARD JONES JR
SARA L JONES
Debtors

Chapter 13

CERTIFICATE OF SERVICE

Kristina L. Wilder, being first duly sworn on oath, states that she is an employee in the office of Rebecca R. Garcia, Standing Chapter 13 Trustee, P.O. Box 3170, Oshkosh, WI 54903-3170 and on the 13th day of March 2018, a copy of the trustee's Objection to Confirmation of Chapter 13 Plan filed January 5, 2018, was mailed in a first class postage paid envelope to the following:

and the following were served electronically

Dated the 13th day of March 2018.
/s/ Kristina L. Wilder
 Kristina L. Wilder